

1 WRIGHT, FINLAY & ZAK, LLP
2 Darren T. Brenner, Esq.
3 Nevada Bar No. 8386
4 Lindsay D. Dragon, Esq.
5 Nevada Bar No. 13474
6 7785 W. Sahara Ave., Suite 200
7 Las Vegas, NV 89117
8 (702) 475-7964; Fax: (702) 946-1345
9 ldragon@wrightlegal.net

Attorneys for Plaintiff, HSBC Bank USA, N.A., As Trustee For The Registered Holders Of Nomura Home Equity Loan, Inc., Asset-Backed Certificates, Series 2006-HE2

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 HSBC BANK USA, N.A., AS TRUSTEE
13 FOR THE REGISTERED HOLDERS OF
14 NOMURA HOME EQUITY LOAN, INC.,
15 ASSET-BACKED CERTIFICATES, SERIES
16 2006-HE2,

17 Plaintiff,

18 vs.

19 FIDELITY NATIONAL TITLE INSURANCE
20 COMPANY,

21 Defendant.

Case No.: 3:19-CV-00265-MMD-CSD

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO RESPOND
TO MOTION TO DISMISS [ECF No. 73]**

[First Request]

22 Plaintiff, HSBC Bank USA, N.A., As Trustee For The Registered Holders Of Nomura Home Equity Loan, Inc., Asset-Backed Certificates, Series 2006-HE2 (“HSBC”) and Defendant Fidelity National Title Insurance Company (“Fidelity”), by and through their counsel of record, hereby stipulate and agree as follows:

- 23 1. On October 21, 2022, HSBC filed its Second Amended Complaint [ECF No. 69];
- 24 2. On November 1, 2022, Fidelity filed a Motion to Dismiss the Second Amended
25 Complaint [ECF No. 73];
- 26 3. HSBC’s deadline to respond to Fidelity’s Motion to Dismiss is currently November
27 15, 2022;

- 1 4. HSBC's counsel is requesting a brief, one-week extension until November 22, 2022,
2 to file its response to the pending Motion due to unforeseen technical difficulties;
3 5. Counsel for Fidelity does not oppose the requested extension;
4 6. This is the first request for an extension which is made in good faith and not for
5 purposes of delay.

6 **IT IS SO STIPULATED.**

7 DATED this 15th day of November, 2022.

DATED this 15th day of November, 2022.

8 WRIGHT, FINLAY & ZAK, LLP
9

EARLY SULLIVAN WRIGHT GIZER &
McRAE LLP

10 /s/ Lindsay D. Dragon

/s/ Scott E. Gizer

11 Lindsay D. Dragon, Esq.

Scott E. Gizer Esq.

12 Nevada Bar No. 13474

Nevada Bar No. 12216

13 7785 W. Sahara Ave., Suite 200

8716 Spanish Ridge Avenue, Suite 105

14 Las Vegas, NV 89117

Las Vegas, Nevada 89148

15 *Attorneys for Plaintiff, HSBC Bank USA,*

Attorney for Defendant, Fidelity National

16 *N.A., As Trustee For The Registered Holders*

Title Insurance Company

17 *Of Nomura Home Equity Loan, Inc., Asset-*

18 *Backed Certificates, Series 2006-HE2*

19 **IT IS SO ORDERED.**

20 Dated this 15th day of November, 2022.

21 

22 UNITED STATES DISTRICT COURT JUDGE
23
24
25
26
27
28